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December 20, 2013

By: ECF

Magistrate Judge Ramon E. Reyes, Jr. United States District Court Eastern District of New York 225 Cadman Plaza East, Rm. N208 Brooklyn, New York 11201

Re: Amalia Fasano v. Tyco Healthcare Group, LP, et al.

United States District Court, E.D.N.Y. Case No.: 13-CV-03083 (ENV)(RER)

Dear Magistrate Judge Reyes:

We represent Covidien LP (sued as Tyco Healthcare Group LP), in the above-matter.

We write pursuant to Section III B of your Motion and Individual Practice Rules to request a pre-motion conference. Covidien would like to make a motion, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, to admit, pro hac vice, one of its national coordinating counsel, Jennifer Stonecipher Hill, in this matter. I have communicated with plaintiff's counsel and he has no objection to Ms. Hill's admission.

Given Mr. Sadaka's consent, I have enclosed a copy of Ms. Hill's affidavit in support of admission; her Certificate of Good Standing; and a proposed Order, in the event that you determine that a formal motion is not required.

Thank you for your time and attention to this matter.

Respectfully submitted,

William E. Vita

WEV/db

cc: Mark T. Sadaka, Esq. (By ECF)

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